

UNITED STATES DISTRICT COURT

for the

Eastern District of Pennsylvania

United States of America

v.

LEROY HAWKS

Case No. 14-655-M

Defendant(s)

CRIMINAL COMPLAINT

I, the complainant in this case, state that the following is true to the best of my knowledge and belief.

On or about the date(s) of June 25, 2014 in the county of Philadelphia in the
Eastern District of Pennsylvania, the defendant(s) violated:

Code Section

18 U.S.C. § 2111

Offense Description

Attempted Robbery

This criminal complaint is based on these facts:

SEE ATTACHED AFFIDAVIT

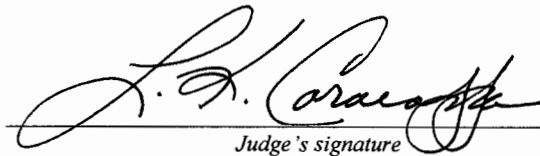
☐ Continued on the attached sheet.


Complainant's signature

Mary Town, U.S. Park Ranger

Printed name and title

Sworn to before me and signed in my presence.

Date: 06/25/2014


Judge's signature

City and state: Philadelphia, PA

HON. LINDA K. CARACAPPA, USMJ

Printed name and title

AFFIDAVIT

I, Mary Town, being duly sworn, depose and state as follows:

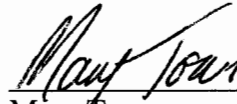
1. I am a U.S. Park Ranger assigned to the Independence National Historical Park. I have been so employed since 2003. As such, I am empowered to make arrests for crimes committed within the special maritime and territorial jurisdiction of the United States pursuant to the General Authorities Act, 16 U.S.C. § 1a-6(b).

2. The information contained in this affidavit is based upon my personal knowledge, information provided to me by other law enforcement officers, the victim, and other witnesses.

3. Because this affidavit is being submitted for the limited purpose of obtaining an arrest warrant and criminal complaint against LEROY HAWKS for attempted robbery in violation of 18 U.S.C. § 2111, I have not included each and every fact known to me concerning this incident.

4. On June 25, 2014, around 11:30 a.m., Victim JM was walking east down the sidewalk on Chestnut Street between Third and Fourth Street near the entrance to the Franklin Court complex. Based upon my training and experience, I know that this specific location is within the Independence National Historical Park and thus within the special maritime and territorial jurisdiction of the United States. While Victim JM was walking in this location, she observed a man, later identified as the defendant, LEROY HAWKS, pushing a shopping cart towards her. As HAWKS approached Victim JM, HAWKS demanded, "give me some money." Initially, Victim JM tried to ignore HAWKS demands. HAWKS walked closer to Victim JM, pointed at her purse, and stated, "Bitch, give me some money." When Victim JM took a step away from HAWKS, HAWKS kicked Victim JM in her right leg. Victim JM reported that she was "very scared" by HAWKS's actions. Victim JM yelled for help then ran across the street in fear of HAWKS. U.S. Park Service Employee SD, who was working nearby, heard Victim JM call for help and radioed for law enforcement assistance. HAWKS then approached Employee SD, got close to his face, and stated, "You got a problem with me?" Supervisory U.S. Park Ranger Ryan McLeod arrived on the scene shortly thereafter and detained HAWKS.

5. Based on the above facts, I believe that there is probable cause to conclude that on June 25, 2014, in the Eastern District of Pennsylvania, LEROY HAWKS attempted to rob Victim JM in violation of 18 U.S.C. § 2111, that is, HAWKS attempted to take, by force, violence, and intimidation, the property of another, that is, the purse of Victim JM, within the special maritime and territorial jurisdiction of the United States.



Mary Town
U.S. Park Ranger

Sworn and subscribed
before me this 25th day
of June, 2014.


HON. LINDA K. CARACAPPA
United States Magistrate Judge